

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289-JPM-dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and,
MARK P. CLEMONS,

Defendants.

**NOTICE TO TAKE VIDEOTAPED DISCOVERY DEPOSITION OF HELEN
LOVELACE**

Please take notice that the defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D., through counsel of record, by agreement with counsel and pursuant to Rules 26 and 30 of the Tennessee Rules of Civil Procedure, will take the audio-visual discovery deposition of Helen Lovelace on Wednesday, January 15th, 2014, beginning at 10:00 a.m. Central Time at the law offices of Halliburton & Ledbetter located at 245 Court Avenue, Suite 305, Memphis, TN 38103 upon oral examination pursuant to the Tennessee Rules of Civil Procedure, audio-visually and stenographically before an officer duly authorized to administer oath. The witness is instructed to produce and permit copying of the following documents:

1. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things the witness may have which pertain in any way to this lawsuit.

2. All letters, tape recordings, records, reports, notes, computer generated information or other writings or things generated by the witness, received by the witness, reviewed by the witness, provided to the witness or reviewed by anyone, including counsel, in the presence of the witness, in preparation for this deposition.
3. A list of the names and addresses of all known witnesses to the matter at issue and the names and addresses of all health care providers who have treated or provided services for Brett Lovelace for the past ten (10) years.
4. All documents which support plaintiff's claim for economic loss.
5. All other documents of any and every kind and nature, which support plaintiff's claim in this case.
6. Any and all medical reports, reports of loss of earning capacity, reports of loss of earnings, and all other documents of whatsoever kind or nature, which tend to prove or disprove any issue of fact in this case.
7. Any and all diaries, narratives, or other accounts of any of the events pertaining to the alleged claim of Brett Lovelace which is the subject of this case, or of any of the damages or injuries allegedly suffered by Brett Lovelace in this case, prepared by the witness or any other person in whatever format.
8. All photographs, charts, pictures, diagrams, videotapes, or other documents or things of any kind, which reflect in any manner the injuries alleged to have been sustained or damages alleged to have been suffered by Brett Lovelace in this matter, including any documents, videos, photographs, and any other documents or things of any kind.
9. All other documents and things of any and every kind and nature which pertain to the claim of Brett Lovelace in this case.

Said deposition will continue from day to day until completed. You are hereby notified to appear and take such part in the examination as you may be advised and as shall be fit and proper.

Respectfully submitted,

THE HARDISON LAW FIRM, P.C.

By: /s/ David M. Cook

DAVID M. COOK (BPR # 005362)
ALBERT G. MCLEAN (BPR # 005150)
*Attorneys for Defendants, Babu Rao
Paidipalli, M.D. and Pediatric
Anesthesiologists, P.A.*
119 South Main Street, Suite 800
Memphis, TN 38103
(901) 525-8776 – telephone
(901) 525-8790 – facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was served on the following counsel of record via U.S. Mail, postage prepaid, this 6th day of January, 2013.

Mark Ledbetter, Esq.
Halliburton & Ledbetter
Attorney for Plaintiffs
245 Court Avenue, Suite 305
Memphis, TN 38103

J. Kimbrough Johnson, Esq.
Marcy Dodds Magee, Esq.
*Attorneys for Defendant, Mark P.
Clemons, M.D.*
Thomason, Hendrix, Harvey, Johnson &
Mitchell, PLLC
2900 One Commerce Street
40 South Main Street
Memphis, TN 38103

/s/ David M. Cook

DAVID M. COOK